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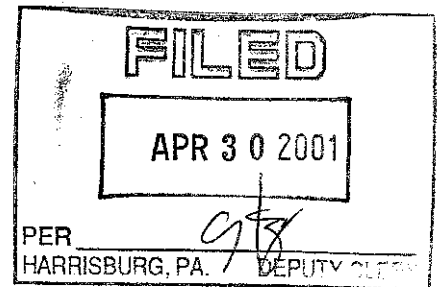
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UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

PAUL TURPIN,)	Civil No. 1:CV-01-0168
Petitioner)	
)	(Judge Rambo)
v.)	
)	
IMMIGRATION & NATURALIZATION)	
SERVICE,)	
Respondent)	

RESPONDENT'S MOTION FOR
EXTENSION OF TIME



Respondent Immigration and Naturalization Service (INS), by and through undersigned counsel, respectfully moves the Court for an extension of time within which to respond to the Petition for Writ of Habeas Corpus. In support thereof, Respondent avers the following:

1. Petitioner Paul Turpin filed the instant Petition for Writ of Habeas Corpus pro se on January 26, 2001.
2. On February 7, 2001, the Court directed service of the Petition on Respondent INS, and directed that Respondent show cause why Petitioner should not be granted habeas corpus relief.
3. Respondent's response was filed on February 27, 2001.
4. On March 8, 2001, the Court granted Turpin's request to have counsel appointed to represent him.
5. On April 6, 2001, Turpin filed an amended petition.
6. On April 9, 2001, the Court issued a Show Cause Order

directing Respondent to show cause within twenty days whey Turpin should not be granted habeas relief.

7. Respondent's response is due today, April 30, 2001.

8. Agency Counsel was out of the Office due to illness from April 25, 2001 through April 27, 2001.

9. Based on the above, counsel for Respondent respectfully requests a seven-day extension of time in which to respond to the Writ of Habeas Corpus.

10. Petitioner will not be prejudiced by this brief delay.

11. Undersigned counsel attempted to contact counsel for petitioner to seek his concurrence but counsel was out of the Office.

WHEREFORE, Respondent respectfully requests a seven-day extension of time in which to file a response to the Writ of Habeas Corpus.

Respectfully submitted,

DAVID M. BARASCH
UNITED STATES ATTORNEY



DULCE DONOVAN
ASSISTANT U.S. ATTORNEY
228 Walnut Street
P.O. Box 11754
Harrisburg, PA 17108
717/221-4482

Dated: April 30, 2001

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

PAUL TURPIN,)	Civil No. 1:CV-01-0168
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)	(Judge Rambo)
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SERVICE,)	
Respondent)	

CERTIFICATE OF NON CONCURRENCE

Undersigned counsel attempted to contact Dan Seigel, Turpin's counsel, to seek his concurrence in Respondent's motion for an extension of time, but Mr. Seigel was out of the Office.

Date:

4/30/01

Dulce Donovan
Dulce Donovan

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)	
IMMIGRATION & NATURALIZATION)	
SERVICE,)	
Respondent)	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion to be competent to serve papers.

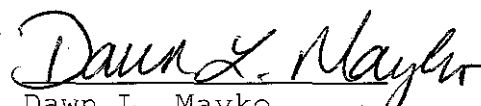
That this 25th day of April 2001, she served a copy of the attached

RESPONDENT'S MOTION FOR AN EXTENSION OF TIME

by placing said copy in a postpaid envelope addressed to the person hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail at Harrisburg, Pennsylvania.

ADDRESSEE(S)

Dan Seigel, Esquire
Federal Public Defender's Office
100 Chestnut Street
Suite 306
Harrisburg, PA 17101


Dawn L. Mayko
Legal Secretary